



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 12, 2019

REQUEST TO FILE UNDER SEAL

The Honorable Kevin Nathaniel Fox
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

19 ~~CRIM~~ 915

Re: United States v. Wayne Franklyn Chinn, 19 Cr.

Dear Judge Fox:

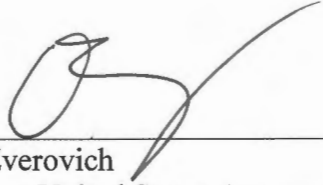
The Government respectfully requests that the Information, plea agreement, and any transcript and minute entries in the above case remain under seal (with copies available to the parties) until sentencing to protect the integrity of the Government's ongoing investigation of uncharged targets. The Government further respectfully requests that Your Honor enter a limited unsealing order that would permit the Government to disclose the Information, plea agreement, and related records to Singaporean law enforcement and prosecuting authorities, including the Attorney-General's Chambers and the Singapore Police Force, in connection with the Government's discussions with the Singaporean authorities regarding the funds that are currently frozen in Singapore, as referenced in the plea agreement.

Given the nature of this request, the Government respectfully requests that this request, and any resulting order, be filed under seal.

Respectfully submitted,

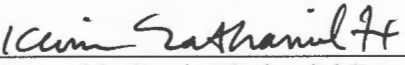
GEOFFREY S. BERMAN
United States Attorney

By:



Olga Zverovich
Assistant United States Attorney
(212) 637-2514

SO ORDERED: 12/19/19



The Honorable Kevin Nathaniel Fox
United States Magistrate Judge
Southern District of New York